

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
The Use of N11 Codes and Other	)	CC Docket No. 92-105
Abbreviated Dialing Arrangements	)	

**REPLY COMMENTS OF THE FLORIDA DEPARTMENT OF  
TRANSPORTATION (FDOT)**

The FDOT hereby submits its Reply Comments to the Comments filed to refresh the record regarding reconsideration of the Commission's designation of the 211 and 511 abbreviated dialing codes. The 511 abbreviated dialing code is a powerful dissemination tool and is necessary to enhance Florida's ability to deliver needed travel information to motorists who travel the State's roadways everyday. As an example of the benefits of utilizing 511, Southeast Florida converted a ten-digit phone number to 511 and immediately saw an increase of over 600% in their call volumes. Providing the right information to the motorist at the right time empowers the motorist with the ability to make travel decisions to avoid and/or reduce the high congestion levels found in Florida's heavily populated urban areas.

The part of the equation regarding the designation of 511 as a travel information phone number that seems to be lost, is the data collection system that is needed to support the dissemination of travel information. For 511 to be successful in providing travel information, information on roadway conditions must be readily available. Public transportation agencies are in the best position to collect the information needed to disseminate through a 511 system and to maximize the use of the 511 abbreviated dialing code. Public agencies reach out and make information available to everyone and not just those who may subscribe to a certain carrier. Reversing the 211/511 Assignment Order would be a step backwards and would impact Traffic Engineers ability to manage traffic on the State's roadways.

**1. BACKGROUND OF 511 SERVICE**

Implementation Overview

Presently the state of Florida has three functioning regional 511 systems. These systems provide travel information to motorists in the Southeast part of the state, the Orlando area, and in the Tampa Bay area. About two thirds of the state's population has access to 511 and can receive travel information via wire-line and wireless phone service to date. Florida has future plans to incorporate these three regional 511 systems into a single

statewide 511 system. Information on incidents, road and/or lane closures, construction and weather will be available to all callers on a statewide basis. More detailed information will be provided for the three existing regional systems as well as Southwest Florida and the Jacksonville area. More detailed information will be collected from sensors placed in and/or adjacent to the roadway as ITS matures in the existing regional systems, and the new areas of Southwest Florida and Jacksonville.

511 service in the Orlando area began in May 2002, in the Southeast Florida area in June 2002 and in the Tampa Bay area in September 2004. Florida anticipates launching the initial statewide system in 2005 and being able to bring in more detailed information for Southwest Florida and Jacksonville by 2006. Under the initial statewide plan, call transfers will have to be initiated to access the information available in the Tampa Bay area and Southwest Florida. By 2008, the 511 system will be reconfigured to provide for a single 511 service statewide.

### User Statistics

Florida's 511 call counts total over 399,630 for the month of September. The total call counts need to be tempered, however, by the fact that three hurricanes hit Florida during the month of September. Some spiking was noticed prior to the arrival of the three hurricanes. Total 511 call counts for the three systems from launch through September 2004, total over 6,400,000 calls.

Southeast Florida converted a ten-digit number to 511 in June 2002. Prior to the implementation of 511, monthly call counts averaged about 11,250 calls per month. At the end of the first full month when 511 was available, the calls jumped to nearly 75,000 calls per month. Calls have now climbed to over 211,000 calls per month in Southeast Florida.

### Customer Satisfaction

Southeast Florida is the only area where user satisfaction has been assessed. Based on that assessment, 96% of the users have indicated that they are satisfied with the 511 service. 80% of the users indicated that 511 was either their most and/or second most important source of transportation information.

### Future Implementation Funding

The FDOT has set aside funding in the Department's Ten-Year ITS Cost Feasible Plan (CFP) to expand the 511 system into a single statewide system. Funds are programmed to add Southwest Florida and Jacksonville to the statewide system in 2006 and additional funds have been programmed in 2008 to roll the regional systems into the statewide system, as an integral part of the statewide system. Funds have also been programmed in the out years of the CFP to continue 511 service into the foreseeable future.

## **2. IMPLEMENTATION EXPERIENCED RELATED TO ISSUES RAISED BY THE CARRIERS**

### Multiple Requests for the 511 Code

The FDOT is not aware of any requests to utilize the 511 abbreviated dialing code outside the FDOT environs. In fact the FDOT has taken measures to eliminate the potential for multiple requests from public agencies that would be authorized to implement the 511 abbreviated dialing code under the FCC's *211/511 Assignment Order*. The Florida Legislature passed legislation that gives the FDOT control over the usage of the 511 abbreviated dialing code. This legislation does not preclude other public agencies from utilizing 511, but requires that agencies coordinate with the FDOT to assure that the implementation is compatible with the National 511 Deployment Coalition's guidelines and will not degrade existing 511 services.

### Wireless Call Routing Issues

The FDOT does not have any issues with call routing at this time, between adjacent states. The adjacent states have not progressed in their deployment of 511 to create any problems. However, with the implementation of the 511 system in the Tampa Bay area, and the proximity of the Tampa Bay system to the Orlando system, call routing issues arose. You could be in the Tampa Bay area, and because of the switch topography, you would get information for Orlando. The issue has been addressed through the implementation of tower level programming, which better matches the boundary between the Tampa Bay system and the Orlando system. This does not eliminate call routing issues altogether, some calls made near the border between systems may still get routed to the wrong system. To resolve the residual problem left by tower level programming, the systems have the capabilities to transfer calls that have been misrouted to the correct system.

The tower level programming was not a big issue for the carriers. There were some costs involved with this endeavor, which the FDOT agreed were appropriate and reasonable. The problem was getting information from the carriers to determine how to implement tower level programming. This information is proprietary and public disclosure of the information could impact the carriers' ability to generate revenue. This problem was generally resolved through the use of non-disclosure agreements.

### 511 Does Not Inhibit Private Traveler Information Services

There were no private services providing traveler information over the phone through the use of 511. The state of Florida did have a dating service that utilized the 511 phone number. This service was found in Southeast Florida and in the Orlando area. As required by the FCC, they ceased use of the phone number upon notification by the FDOT that the FDOT wanted to utilize the 511 abbreviated dialing code for the provision of travel information. Florida DOT is encouraging private firms to leverage the same data we use to provide 511 services to provide enhanced value-added traveler information services.

To date, we have seen very little by way of advanced products and services being introduced by wireless carriers or any other private firms, suggesting the issue is market forces, not presence or absence of 511.

### **3. CONCLUSION**

The provision of traveler information through the use of the 511 abbreviated dialing code seems to be well received in Florida. Satisfaction levels are high based on all the assessments that have been completed to date. The FDOT is in the process of improving the existing systems and expanding the coverage to include the complete state. The concerns and issues identified by the wireless carriers in their Petition of Reconsideration, have not seemed to have materialized in Florida. Florida does not support any additional rule making regarding 511 at this time. A reversal of the original order would have significant adverse impact on the FDOT's ability to deliver timely traveler information to the motorists that travel Florida's roadways.